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Attorneys for Lehman Brothers Holdings Inc. and Certain of Its Affiliates

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (SCC)

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Debtors. : (Jointly Administered)

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CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746 REGARDING THE PLAN ADMINISTRATOR'S OBJECTION TO CLAIM NO. 25496 HELD BY WILMAR TRADING PTE LTD.

TO THE HONORABLE SHELLEY C. CHAPMAN UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. On February 5, 2015, Lehman Brothers Holdings Inc. (the "<u>Plan</u> <u>Administrator</u>"), as Plan Administrator under the *Modified Third Amended Joint Chapter 11* Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, filed the Objection to Claim No. 25496 Held By Wilmar Trading PTE Ltd. [ECF No. 48095] (the "<u>Objection</u>") with the Court for hearing.

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> 2. In accordance with the Second Amended Case Management Order, the

Plan Administrator established a deadline (the "Response Deadline") for parties to object or file

responses to the Objection. The Response Deadline was set for March 9, 2015 at 4:00 p.m. The

Second Amended Case Management Order provides that pleadings may be granted without a

hearing, provided that no objections or other responsive pleadings have been filed on or prior to

the relevant response deadline and the attorney for the entity who filed the pleading complies

with the relevant procedural and notice requirements.

3. The Response Deadline has now passed and, to the best of my knowledge,

no responsive pleadings to the Objection have been (a) filed with the Court on the docket of the

above-referenced cases in accordance with the procedures set forth in the Second Amended Case

Management Order, or (b) served on counsel to the Plan Administrator.

4. Accordingly, the Plan Administrator respectfully requests that the

proposed order granting the Objection annexed hereto as Exhibit A, which is unmodified since

the filing of the Objection, be entered in accordance with the procedures described in the Second

Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: March 10, 2015

New York, New York

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Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (SCC)

Debtors. : (Jointly Administered)

-----X

ORDER GRANTING THE PLAN ADMINISTRATOR'S OBJECTION TO CLAIM NO. 25496 HELD BY WILMAR TRADING PTE LTD.

Upon the objection, dated February 5, 2015 (the "Objection"), 1 of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for the entities in the above-referenced chapter 11 cases, pursuant to section 502(b) of title 11 of the Bankruptcy Code, Rule 3007(d) of the Bankruptcy Rules, and this Court's order approving procedures for the filing of objections to proofs of claim [ECF No. 6664], seeking disallowance of the Satisfied Guarantee Claim, all as more fully described in the Objection; and due and proper notice of the Objection having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Objection is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Objection is granted; and it is further ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the Satisfied Guarantee Claim is disallowed and expunged in its entirety; and it is further

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in Objection.

ORDERED that this Court shall re	etain jurisdiction to hear and determine all
matters arising from or related to this Order.	
Dated:, 2015 New York, New York	
UNITED STATES BANKRUPTCY JUDGE	